

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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JUSTINO CRUZ ROSALES, LUIS DIAZ, and  
CARLOS NAVARRO, individually and on behalf  
of all others similarly situated,

Case No.: 24-CV-5572 (JGLC)

Plaintiffs,

-against-

**NOTICE OF MOTION**

BKLYN LOCAL DRAFT LLC  
d/b/a THE BROOKLYNEER,  
BILLY WAITE, and JUAN GOMEZ,

Defendants.

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**NOTICE OF MOTION TO BE RELIEVED AS COUNSEL OF  
RECORD FOR ALL DEFENDANTS IN THIS ACTION**

**PLEASE TAKE NOTICE THAT**, upon the accompanying Declaration of Nils C. Shillito,  
and upon all pleadings and proceedings heretofore had herein, Stephen D. Hans & Associates, P.C.  
hereby moves this Court, before the Honorable Jessica G. L. Clarke, United States District Judge for  
the Southern District of New York, pursuant to Local Civil Rule 1.4 for an Order:

(1) relieving Stephen D. Hans & Associates, P.C., and, specifically, attorneys

Stephen D. Hans and Nils C. Shillito, as counsel of record for defendants BKLYN  
Local Draft LLC, Billy Waite, and Juan Gomez in the above-captioned action;

(2) staying all discovery proceedings and deadlines in this case until June 13, 2025 in  
order to permit defendants the opportunity to retain new counsel; and

(3) granting such other and further relief as the Court deems just and proper.

Dated: Long Island City, New York  
May 16, 2025

STEPHEN D. HANS & ASSOCIATES, P.C.  
*Attorneys for the Defendants*

By: /s/Nils C. Shillito  
Nils C. Shillito  
30-30 Northern Boulevard, Suite 401  
Long Island City, New York 11101  
Tel: 718.275.6700

NOTICE TO:

KatzMelinger  
Nicole D. Grunfeld, Esq.  
*Counsel for Plaintiffs*  
(via ecf)

BKLYN Local Draft LLC  
220 West Houston Street  
New York, NY 10014  
(via first class mail)

Billy Waite  
c/o The Brooklyneer  
220 West Houston Street  
New York, NY 10014  
(via email and first class mail)

Juan Gomez  
c/o The Brooklyneer  
220 West Houston Street  
New York, NY 10014  
(via email and first class mail)